

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

UNITED STATES OF AMERICA,	:	INDICTMENT NO.: CR219-0003
	:	
VS.	:	
	:	
VINCENT SANDERS,	:	
	:	
Defendant.	:	

**DEFENDANT'S MOTION FOR AMENDMENT OF HIS
CONDITIONS FOR PRETRIAL RELEASE**

COMES NOW, VINCENT SANDERS, Defendant in the above-styled matter, by and through counsel, and respectfully moves this Honorable Court for an order amending the conditions of his pretrial release, and in support thereof, shows this Honorable Court as follows:

1,

On February 12, 2019, the Defendant appeared before this Honorable Court for arraignment and consideration of pretrial release and the Court issued an "Order Setting Conditions of Release" that required the Defendant to be subject to a curfew from 10:00 p.m., to 6:00 a.m., every day.

2.

The Defendant is employed at a "Dollar Tree Store" located at 5110 Summer Avenue, Memphis, Tennessee and works the 10:00 p.m., to 6:00 a.m., shift between three to five days per week. (See Exhibit "A" attached hereto and by reference incorporated herein).


3.

The "curfew" conditions of the Defendant's Pretrial Release are interfering with the Defendant's ability to work at gainful employment and he respectfully requests this Honorable Court to amend his "curfew" conditions so that they do not so interfere.

WHEREFORE, the Defendant, Vincent Sanders, respectfully requests this Honorable Court to enter an order amending the "curfew" conditions of his pretrial release.

This 25th day of February, 2019.

ALAN DAVID TUCKER, ESQ., P.C.

By: 
Alan David Tucker, Esq.
Attorney for Defendant
Georgia Bar No. 717559

9 St. Andrews Court, Suite 201
Brunswick, GA 31520
912-267-7123
912-267-0782-Fax

EXHIBIT “A”

2-15-19

To whom it may concern

Vincent Sanders works

Saturday Sunday + wed

9pm to 6am

Fridays

7am - 4pm

x Rachel Evans
Rachel Evans

Dollartree Store Manager

5110 Summer Ave

Mphs, TN 901-766-2943



Alan Tucker <alan@alantuckeratty.com>

Vincent Sanders

1 message

Tania Wesson <TARIVERA@dollartree.com>

Mon, Feb 18, 2019 at 4:08 PM

To: "alan@alantuckeratty.com" <alan@alantuckeratty.com>

Mr. Tucker,

I am the District Manager of the Dollar Tree location that Mr. Sanders works at on Summer Ave. His works schedule will normally be 10p to 6am anywhere from three to five days a week. Unfortunately, we at this level do not have letterhead paperwork for him to turn into you. If you do have questions or need more information, please feel free to call his store manager Rachel Evans at 901-766-2943, or myself at 731-727-5400.

Thank you,

Tania Wesson

Temp DM 220

731-727-5400

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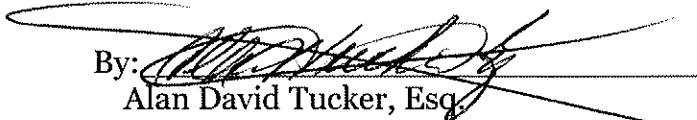
UNITED STATES OF AMERICA,	: INDICTMENT NO.: CR219-0003
	:
VS.	:
	:
VINCENT SANDERS,	:
	:
Defendant.	:

CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of electronic filing.

This 25th day of February, 2019

ALAN DAVID TUCKER, ESQ. P.C.

By: 
Alan David Tucker, Esq.
Attorney for Defendant
Georgia Bar No. 717559

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